

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

UNITED STATES OF AMERICA §  
§  
v. §  
§  
16.553 ACRES OF LAND, MORE OR LESS, §  
SITUATED IN STARR COUNTY, STATE §  
OF TEXAS; AND 3BU FAMILY LIMITED §  
PARTNERSHIP §

CASE NO.: 7-20-CV-318

MOTION TO WITHDRAW

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Paul R. Wilson, Movant, and files this Motion to Withdraw and shows:

1. Movant files this motion in conformity with Local Rule 83.2.
2. Movant seeks to withdraw because 3BU Family Limited Partnership, Defendant, and 3BU, LLC, through their principal, have asked Movant to withdraw.
3. Currently, this litigation is in its early stages and should not suffer any delay by the granting of this motion. This motion is not sought for delay.
4. Movant is unaware of the plans of Defendants concerning the retention of new counsel. Movant's principal is a sophisticated businessman and capable of dealing with the issue of obtaining new counsel.
5. Currently, the only pending matter is the initial pre-trial conference scheduled for April 7, 2021. There are discussions ongoing about revestment of the property to Defendants if the current presidential administration approves such. Defendants want the property revested if such option becomes available. Defendants would not be opposed to a delay in litigation to give the current presidential administration time to formulate a border land policy. Such

a delay would also give Defendants time to hire other counsel should Defendants chose to do so.

6. Should the Court grant this motion, 3BU Family Limited Partnership and 3BU, LLC, may be contacted through their principal, Arturo Ortega, at 533 N. Alamo Rd., Alamo, TX 78516; (956) 720-4644.

Wherefore, premises considered, Movant respectfully requests the Court grant this motion and allow Movant to withdraw as attorney of 3BU Family Limited Partnership and 3BU, LLC. Movant prays for any and further relief at law, in equity, or generally.

Respectfully Submitted,

Guerra and Sabo, PLLC  
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/s/ Paul R. Wilson  
Paul R. Wilson  
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Attorney for Defendants  
3BU Family Limited Partnership  
3BU, LLC

CERTIFICATE OF SERVICE

I certify a true and correct copy of the foregoing instrument has been served on all parties of record in accordance with F.R.Civ.P. 5 by use of the court's electronic-filing system.

/s/ Paul R. Wilson  
Paul R. Wilson